

**Exhibit A**

**Proposed Order**

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et*  
*al.*,

Debtors.<sup>1</sup>

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

This filing relates to the  
Commonwealth and ERS.

**ORDER GRANTING FOUR HUNDRED SEVENTIETH  
OMNIBUS OBJECTION (SUBSTANTIVE) OF THE COMMONWEALTH  
OF PUERTO RICO AND THE EMPLOYEES RETIREMENT SYSTEM OF THE  
GOVERNMENT OF THE COMMONWEALTH OF PUERTO RICO TO NO LIABILITY  
CLAIMS FILED BY AEELA MEMBERS**

Upon the *Four Hundred Seventieth Omnibus Objection (Substantive) of the  
Commonwealth of Puerto Rico and the Employees Retirement System of the Government of the  
Commonwealth of Puerto Rico to No Liability Claims Filed by AEELA Members* [ECF No. 21419]

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<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the "Commonwealth") (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA", and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the "Debtors") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations)

(the “Four Hundred Seventieth Omnibus Objection”)<sup>2</sup> filed by the Commonwealth of Puerto Rico (the “Commonwealth”) and the Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS,” and together with the Commonwealth, the “Debtors”), dated July 1, 2022, for entry of an order disallowing in their entirety certain claims filed against the Debtors, as more fully set forth in the Four Hundred Seventieth Omnibus Objection and supporting exhibits thereto; and the Court having jurisdiction to consider the Four Hundred Seventieth Omnibus Objection and to grant the relief requested therein pursuant to PROMESA section 306(a); and venue being proper pursuant to PROMESA section 307(a); and due and proper notice of the Four Hundred Seventieth Omnibus Objection having been provided to those parties identified therein, and no other or further notice being required; and the claims identified in the column titled “Claims to be Disallowed” in Exhibit A to the Four Hundred Seventieth Omnibus Objection (collectively, the “Claims to Be Disallowed”) asserting claims for which the Debtors are not liable; and the Court having determined that the relief sought in the Four Hundred Seventieth Omnibus Objection is in the best interest of the Debtors, their creditors, and all the parties in interest; and the Court having determined that the legal and factual bases set forth in the Four Hundred Seventieth Omnibus Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the Four Hundred Seventieth Omnibus Objection is GRANTED as set forth herein; and it is further

ORDERED that the Claims to Be Disallowed are hereby disallowed in their entirety; and it is further

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<sup>2</sup> Capitalized terms not otherwise defined herein shall have the meanings given to such terms in the Four Hundred Seventieth Omnibus Objection.

ORDERED that Kroll is authorized and directed to designate the Claims to Be Disallowed as expunged on the official claims register in the Title III Case; and it is further

ORDERED that this Order resolves Docket Entry No. 21419 in Case No. 17-3283; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

SO ORDERED.

Dated: \_\_\_\_\_

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Honorable Judge Laura Taylor Swain  
United States District Judge

**EXHIBIT A**

**Schedule of Claims Subject to the Four Hundred Seventieth Omnibus Objection**

Four Hundred Seventieth Omnibus Objection  
Exhibit A - Claims to Be Disallowed

	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
1	ALVARADO MERCADO, CAROL VILLAS DE SAN BLAS #17 COAMO, PR 00769	03/19/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	3458-1	Undetermined*
	Reason: Proof of Claim fails to provide a basis for asserting a claim against Commonwealth of Puerto Rico. Proof of Claim and supporting documentation only show liability between Claimant and Asociacion de Empleados Del ELA (AEELA), which is not part of the Title III proceedings. A portion of this claim has been transferred into the Administrative Claims Reconciliation (ACR) process and will be resolved consistent with the ACR procedures. Because this objection does not constitute an objection to the portion of the claim in the ACR process, the Debtors' reserve their rights to object to the remaining portion of the claim on any other grounds whatsoever.					
2	AVILES, BLANCA E. HC 1 BOX 2281 LAS MARIAS, PR 00670	02/03/2020	17 BK 03283-LTS	Commonwealth of Puerto Rico	173092-1	Undetermined*
	Reason: Proof of Claim fails to provide a basis for asserting a claim against Commonwealth of Puerto Rico. Proof of Claim and supporting documentation only show liability between Claimant and Asociacion de Empleados Del ELA (AEELA), which is not part of the Title III proceedings. A portion of this claim has been transferred into the Administrative Claims Reconciliation (ACR) process and will be resolved consistent with the ACR procedures. Because this objection does not constitute an objection to the portion of the claim in the ACR process, the Debtors' reserve their rights to object to the remaining portion of the claim on any other grounds whatsoever.					
3	CARDONA RIVERA, WILMER A. FOREST HILLS CALLE 4 B-17 BAYAMON, PR 00959	06/27/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	102021-1	Undetermined*
	Reason: Proof of Claim fails to provide a basis for asserting a claim against Commonwealth of Puerto Rico. Proof of Claim and supporting documentation only show liability between Claimant and Asociacion de Empleados Del ELA (AEELA), which is not part of the Title III proceedings. A portion of this claim has been transferred into the Administrative Claims Reconciliation (ACR) process and will be resolved consistent with the ACR procedures. Because this objection does not constitute an objection to the portion of the claim in the ACR process, the Debtors' reserve their rights to object to the remaining portion of the claim on any other grounds whatsoever.					
4	CINTRON CINTRON, ARNALDO LUIS PO BOX 1201 SALINAS, PR 00751	06/26/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	94127-2	Undetermined*
	Reason: Proof of Claim fails to provide a basis for asserting a claim against Commonwealth of Puerto Rico. Proof of Claim and supporting documentation only show liability between Claimant and Asociacion de Empleados Del ELA (AEELA), which is not part of the Title III proceedings. A portion of this claim has been transferred into the Administrative Claims Reconciliation (ACR) process and will be resolved consistent with the ACR procedures. Because this objection does not constitute an objection to the portion of the claim in the ACR process, the Debtors' reserve their rights to object to the remaining portion of the claim on any other grounds whatsoever.					

Four Hundred Seventieth Omnibus Objection  
Exhibit A - Claims to Be Disallowed

	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
5	COLON OTERO, MYRNA LUZ URB. RAMOS ANTONINI #9 CALLE A CIDRA, PR 00739	09/21/2020	17 BK 03566-LTS	Employees Retirement System of the Government of the Commonwealth of Puerto Rico	175868-1	Undetermined*
Reason: Proof of Claim fails to provide a basis for asserting a claim against Employees Retirement System of the Government of the Commonwealth of Puerto Rico. Proof of Claim and supporting documentation only show liability between Claimant and Asociacion de Empleados Del ELA (AEELA), which is not part of the Title III proceedings. A portion of this claim has been transferred into the Administrative Claims Reconciliation (ACR) process and will be resolved consistent with the ACR procedures. Because this objection does not constitute an objection to the portion of the claim in the ACR process, the Debtors' reserve their rights to object to the remaining portion of the claim on any other grounds whatsoever.						
6	MARTINEZ GARCIA, TERESITA PO BOX 893 DORADO, PR 00646	06/27/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	101300-1	Undetermined*
Reason: Proof of Claim fails to provide a basis for asserting a claim against Commonwealth of Puerto Rico. Proof of Claim and supporting documentation only show liability between Claimant and Asociacion de Empleados Del ELA (AEELA), which is not part of the Title III proceedings. A portion of this claim has been transferred into the Administrative Claims Reconciliation (ACR) process and will be resolved consistent with the ACR procedures. Because this objection does not constitute an objection to the portion of the claim in the ACR process, the Debtors' reserve their rights to object to the remaining portion of the claim on any other grounds whatsoever.						
7	MUNIZ RIVERA, CARMEN 101 CALLE MAYOR PONCE, PR 00730	06/26/2018	17 BK 03566-LTS	Employees Retirement System of the Government of the Commonwealth of Puerto Rico	101261-1	Undetermined*
Reason: Proof of Claim fails to provide a basis for asserting a claim against Employees Retirement System of the Government of the Commonwealth of Puerto Rico. Proof of Claim and supporting documentation only show liability between Claimant and Asociacion de Empleados Del ELA (AEELA), which is not part of the Title III proceedings. A portion of this claim has been transferred into the Administrative Claims Reconciliation (ACR) process and will be resolved consistent with the ACR procedures. Because this objection does not constitute an objection to the portion of the claim in the ACR process, the Debtors' reserve their rights to object to the remaining portion of the claim on any other grounds whatsoever.						
8	ORTIZ GARCIA, NEFTALI HC 0-1 BOX 7364 GUAYANILLA, PR 00656	06/29/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	133681-1	Undetermined*
Reason: Proof of Claim fails to provide a basis for asserting a claim against Commonwealth of Puerto Rico. Proof of Claim and supporting documentation only show liability between Claimant and Asociacion de Empleados Del ELA (AEELA), which is not part of the Title III proceedings. A portion of this claim has been transferred into the Administrative Claims Reconciliation (ACR) process and will be resolved consistent with the ACR procedures. Because this objection does not constitute an objection to the portion of the claim in the ACR process, the Debtors' reserve their rights to object to the remaining portion of the claim on any other grounds whatsoever.						

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	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
9	ORTIZ ORTIZ, NELSON ANIBAL URB. HACIENDA CONCORDIA #11112 CALLE AZALEA SANTA ISABEL, PR 00757	06/28/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	117501-1	Undetermined*
Reason: Proof of Claim fails to provide a basis for asserting a claim against Commonwealth of Puerto Rico. Proof of Claim and supporting documentation only show liability between Claimant and Asociacion de Empleados Del ELA (AEELA), which is not part of the Title III proceedings. A portion of this claim has been transferred into the Administrative Claims Reconciliation (ACR) process and will be resolved consistent with the ACR procedures. Because this objection does not constitute an objection to the portion of the claim in the ACR process, the Debtors' reserve their rights to object to the remaining portion of the claim on any other grounds whatsoever.						
10	RUIZ DELGADO, MIGUEL PO BOX 1056 MAUNABO, PR 00707	06/06/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	60978-1	Undetermined*
Reason: Proof of Claim fails to provide a basis for asserting a claim against Commonwealth of Puerto Rico. Proof of Claim and supporting documentation only show liability between Claimant and Asociacion de Empleados Del ELA (AEELA), which is not part of the Title III proceedings. A portion of this claim has been transferred into the Administrative Claims Reconciliation (ACR) process and will be resolved consistent with the ACR procedures. Because this objection does not constitute an objection to the portion of the claim in the ACR process, the Debtors' reserve their rights to object to the remaining portion of the claim on any other grounds whatsoever.						
11	VAZQUEZ ROMERO, ELSA P.O. BOX 800270 COTO LAUREL, PR 00780-0270	06/25/2018	17 BK 03566-LTS	Employees Retirement System of the Government of the Commonwealth of Puerto Rico	105446-1	Undetermined*
Reason: Proof of Claim fails to provide a basis for asserting a claim against Employees Retirement System of the Government of the Commonwealth of Puerto Rico. Proof of Claim and supporting documentation only show liability between Claimant and Asociacion de Empleados Del ELA (AEELA), which is not part of the Title III proceedings. A portion of this claim has been transferred into the Administrative Claims Reconciliation (ACR) process and will be resolved consistent with the ACR procedures. Because this objection does not constitute an objection to the portion of the claim in the ACR process, the Debtors' reserve their rights to object to the remaining portion of the claim on any other grounds whatsoever.						
TOTAL						Undetermined*